



June 28, 2012

Office of the FCC Secretary
Marlene H Dortch, Secretary
Federal Communication Commissions
445 12th Street SW
Washington DC 20554

Dear Ms. Dortch:

Pursuant to WC Docket No 10-90 of Annual Reporting Requirements, enclosed are copies of the reports filed with our state utility commission for 2011 for Palo Cooperative Telephone Association.

Sincerely,


Kirby Underberg
General Manager



**ETC Certification Reporting Form
Quality of Service Reporting due May 1, 2012
Reporting Period January 1 - December 31, 2011**

CONFIDENTIAL

FCC Outage Reports - 199 IAC 39.5(5). Each ETC shall file copies of all FCC outage reports it filed with the FCC. The copies will be filed as confidential pursuant to the provisions of 199 IAC 1.9(5)"c."

Number of Service Outages Reported to the FCC: 0

(Please file copies of reports filed with the FCC as separate documents in your electronic filing)



ETC Certification Reporting Form
Quality of Service Reporting due May 1, 2012
Reporting Period January 1 - December 31, 2011

Unfilled Requests for Service - 199 IAC 39.5(6). The number of requests for service from potential customers that were unfilled for over five days during the past year.

Number of Requests for Service for Potential Customers that were unfilled during the reporting Period: 0

(Please provide an explanation for each unfilled order along with wire center NXX or geographic area description for the reporting period. To add additional rows to a table, press the tab key when in the bottom right table cell.)

Requesting Consumer Surname:	NPA-NXX or geographic Location:	Explanation:

Complaints - 199 IAC 39.5(7). The number of complaints per 1000 handsets or lines. ETCs serving fewer than 1000 handsets or lines shall report the actual number of complaints.

Number of Complaints per Thousand Handset or Lines: 0

(If less than 1000 handsets/lines, Please provide information as number of complaints per number of handsets or lines. Complaints are defined as complaints from Iowa customers located within the carrier's Iowa ETC designated area and received by the carrier, regarding the provisioning of the required supported services outlined in Iowa Admin. Code Ch. 39.2(1), or complaints regarding unauthorized changes in service.)

CERTIFICATION OF PALO COOPERATIVE TELEPHONE ASSOCIATION

STATE OF IOWA

COUNTY OF LINN

I, Kirby Underberg, General Manager, Palo Cooperative Telephone Association, being of lawful age and duly sworn, depose and state:

Palo Cooperative Telephone Association, 351269, certify that all federal high-cost support provided to Palo Cooperative Telephone Association within Iowa was used in the preceding calendar year and will be used in the coming calendar year only for the provision, maintenance, and upgrading of facilities and services for which the support is intended. In addition, Palo Cooperative Telephone Association certifies that it will comply with applicable service quality standards and consumer protection rules, certifies that it is able to maintain a minimum of two hours of backup power to ensure functionality without an external power source, certifies that it is offering a local usage plan comparable to that offered by the ILEC in the relevant service areas, and certifies that it acknowledges that the FCC may require it to provide equal access to long distance carriers in the event that no other eligible carrier is providing equal access within its ETC designated service area. As an eligible telecommunications carrier, Palo Cooperative Telephone Association agrees to provide timely responses to Board requests for information related to the status of local voice service markets or facilities.

I further state that I am authorized by Palo Cooperative Telephone Association to make this statement.

/s/ Kirby Underberg
[authorized officer]

Subscribed and sworn to before me this 5th day of April, 2012

/s/ Beth J. Rathje
Notary Public

Annual Reporting Requirements pursuant to § 54.313(a)(2)-(6)

WC Docket No. 10-90

§ 54.313(a)(2) – Outage reporting

_____ My company was not required to collect this information in 2011.

☒ My company collected this information pursuant to state utility commission requirement.
A copy of the report is attached.

§ 54.313(a)(3) – Unfulfilled service requests

_____ My company was not required to collect this information in 2011.

☒ My company collected this information pursuant to state utility commission requirement.
A copy of the report is attached.

§ 54.313(a)(4) – Customer complaints per 1000 connections

_____ My company was not required to collect this information in 2011.

☒ My company collected this information pursuant to state utility commission requirement.
A copy of the report is attached.

§ 54.313(a)(5) – Service quality standards and consumer protection rules

I certify that the reporting carrier is in compliance with applicable service quality standards and consumer protection rules.

§ 54.313(a)(6) – Ability to function in emergency situations

I certify that the reporting carrier can function in emergency situations as set forth in 47 CFR §54.202(a)(2). Specifically, the reporting carrier has a reasonable amount of back-up power to ensure functionality without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations.

I am authorized to make this certification on behalf of the company named above and, to the best of my knowledge the information reported on this form is accurate. This certification is for the study area(s) listed below. **(Please enter your Company Name, State and Study Area Code)**

Company Name	State	Study Area Code
Palo Cooperative Telephone Association	Iowa	351269

(If necessary, attach a separate list of additional study areas and check this box.)

☐

Signed,

Kirby J. Underberg

[Signature of Corporate Officer]

Kirby Underberg

[Printed Name of Corporate Officer]

General Manager

[Title of Corporate Officer]

Date:

6 - 28 - 2012

Carrier's Name

Palo Cooperative

Carrier's Address

Carrier's Telephone Number